

Stephen R. McCaughey - 2149
9 Exchange Place, Suite 600
Salt Lake City, Utah 84111
Telephone: (801) 364-6474
Fax: (801) 364-5014
Email: stephen@stephenrmccaughey.com

Attorney for Konstanin Mikhaylovich Tomlin

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KONSTANIN MIKHAYLOVICH
TOMILIN,

Defendant.

**DEFENDANT'S MOTION TO MODIFY
CONDITIONS OF RELEASE**

Case No. 2:19-CR-00394-RJS-DBP-3

Judge Robert J. Shelby

Magistrate Judge Cecilia M. Romero

Konstanin Mikhaylovich Tomilin, through his attorney of record, moves this Court to modify his conditions of release to allow him to travel with his wife to Blackrock, Nevada from August 27, 2023 until September 5, 2023 to attend the Burning Man Festival. He and his wife would rent an R.V. and stay in that during the trip to Blackrock. Mr. Tomilin has not had any violations of his pre-trial release conditions for over two years and has no history of drug or alcohol use. Additionally, he is willing to wear a GPS bracelet during this trip if the Court deems it appropriate.

Mr. Tomilin has previously been allowed to travel multiple times while on release. He went to California two separate times to take his wife and children to the airport. More recently, he was allowed to travel to Florida for a vacation with his family. There have been no violations of his release conditions during either of these trips.

DATED this 9th day of June, 2023.

/s/ Stephen R. McCaughey

STEPHEN R. MCCAUGHEY

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

United States Attorney's Office
Via ECF

/s/ Kristin McCaughey